

REMARKS/ARGUMENTS

This Amendment is being filed concurrently with a Request for Continued Examination (RCE). With this Amendment, Applicant amends claims 1 and 21 and adds new claims 32-39. No new matter is added. Support for the amendments to independent claims 1 and 21 may found at least on page 9 of the originally-filed specification. Therefore, claims 1-25 and 27-39 are all the claims currently pending in the application. Based on the foregoing amendments and the following remarks, Applicant requests reconsideration of the application and allowance of the claims.

I. Rejection of Claims 1-25 and 27-31 Under 35 U.S.C. § 103

Claims 1-25 and 27-31 are rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Crozier (U.S. Patent No. 5,701,423; hereinafter "Crozier") in view of Norin et al. (U.S. Patent No. 5,794,253; hereinafter "Norin").

Claim 1, as herein amended, recites, *inter alia*, "*each information record of the source dataset is assigned a globally unique identifier that is independent of either of the devices, for identifying said each information record at both the source dataset and the target dataset, said globally unique identifier being maintained in a device-independent record map that allows the globally unique identifier to be traced back to a specific information record regardless of whether the specific information record resides on the first or second device; and ... synchronizing information records of the source dataset with information records of the target dataset by: (i) using said globally unique identifiers to delete from the target dataset any information records which have been previously transmitted to the target dataset but no longer exist at the source dataset, and (ii) using said globally unique identifiers to update the target dataset so that said target dataset includes those information records determined to have been added to or modified at the source dataset since the source dataset was last synchronized with the target dataset.*" "[E]ach of the globally unique identifiers comprise a non-modifiable hidden field containing a record identifier which is maintained throughout the existence of a corresponding information record."

Applicant again respectfully submits that the combination of Crozier and Norin does not teach or suggest all of the above features of amended claim 1. In rejecting claim 1, the Examiner correctly concedes that Crozier does not teach or suggest all of the features of claim 1. (See pg. 4 of the Final Office Action dated April 15, 2008) However, the Examiner relies on Norin to make up for the deficiencies of Crozier. In particular, the Examiner relies on Norin as allegedly disclosing the claimed globally unique identifier. (See *id.*) Applicant disagrees.

Applicant again disagrees with the Examiner's assertion that Norin, alone or in combination with Crozier, discloses the claimed globally unique identifier. In rejecting claim 1, the Examiner relies on column 9, lines 64-66 as disclosing the claimed globally unique identifier. However, nowhere in the cited portion or any other portion of Norin is there any mention, teaching or suggestion relating to any globally unique identifiers comprising a non-modifiable hidden field containing a record indicator which is maintained throughout the existence of a corresponding information record. Instead, Norin, alone or in combination with Crozier, is altogether silent regarding any globally unique identifier therein that comprises a field that may not be modified and which is hidden throughout the existence of a corresponding information record. The combination of Norin and Crozier is deficient and does not teach or suggest all of the features of amended claim 1 for at least this reason.

Additionally, in contrast to the Examiner's assertions, there certainly is no mention, teaching or suggestion relating to usage of the "Globally Unique ID (GUID)" of Norin (alleged globally unique identifier of claim 1) to *delete from a target dataset* any information records which have been previously transmitted to the target dataset *but no longer exist* at the source dataset, and using a "Globally Unique ID" to update the target dataset so that the target dataset includes information records determined to have been added to or modified at the source dataset since the source dataset was last synchronized with the target dataset, as would be required by the recitations of claim 1. As noted above, in rejecting claim 1, the Examiner continues to rely on column 9, lines 64-66 of Norin, in combination with Crozier, as disclosing features of claim 1. Applicant disagrees. Rather, the cited portion and indeed all of Norin, alone or in combination with Crozier, at best, explains that "the ability to distinguish one replica node from another ... involves generating a Globally Unique ID (GUID)." As such, Norin, at best, discloses that the "Globally Unique ID" therein is used to distinguish a replica node from another

replica node and explains that “each replica node keeps a list of the” “data sets (data objects).” (Col. 9, lines 13-26 & 61-67 of Norin) Norin also explains that a replica node consists of a server, desktop computer, laptop or any other system where a copy of a data set or data set properties may reside and in which data objects are replicated. (Col. 4, lines 22-23 & Col. 8, lines 24-32 of Norin)

In view of the foregoing, the Globally Unique ID of Norin, at best, serves to identify replica nodes in a network system. Nowhere in Norin, alone or in combination with Crozier, is there any mention, teaching or suggestion relating to assigning GUIDs to any information records of a dataset stored on a device, as would be required by the recitations of claim 1. Moreover, as noted above, there is no mention, teaching or suggestion anywhere in Norin relating to the “Globally Unique ID (GUID)” therein (which the Examiner alleges corresponds to the claimed global unique identifiers) comprising any non-modifiable field that is hidden which contains a record identifier that is maintained throughout the existence of a corresponding information record, as required by amended claim 1. As such, the combination of Crozier and Norin does not teach or suggest all of the features of claim 1.

Additionally, as mentioned in the Response filed June 30, 2008 a skilled artisan at the time of Applicant’s invention simply would not have been motivated to combine the GUID of Norin, which is used to identify a replica node such as a server of Norin with any record identifier of Crozier, to identify any information record at both the handheld computer 101 (alleged source dataset) and the desktop computer 115 (alleged target dataset) and for updating and deleting information records at the desktop computer 115, as would be required by the recitations of claim 1. There simply is no expressed or implied motivation, teaching or suggestion to do so in either Crozier or Norin. As such, Applicant submits that the combination of Crozier and Norin is deficient at least for this additional reason.

Based on at least the foregoing reasons, Applicant again submits that the combination of Crozier and Norin is deficient and do not teach or suggest all of the features of claim 1. Applicant therefore respectfully requests the Examiner to reconsider and withdraw the § 103(a) rejection of claim 1 and its dependent claims 2-20, and 31.

Since claim 21 contains features that are analogous to, though not necessarily coextensive with, the features recited in claim 1, Applicant submits that claim 21 and its

dependent claims 22-25 and 27-30 are patentable at least for reasons analogous to those submitted for claim 1.

II. New Claims

Applicant herein adds new claims 32-39 to provide more varied protection of Applicant's invention as described in the specification. Independent claims 32 and 35 contain features that are analogous to, though not necessarily coextensive with, the features recited in independent claim 1. As such, independent claims 32 and 35 are patentable at least for reasons analogous to those submitted for independent claim 1. In addition to their respective dependencies from independent claims 1 and 21, new claims 38 and 39 are independently patentable given that the cited references, alone or in combination, do not teach or suggest the features of these claims. Moreover, in addition to their respective dependencies from independent claims 32 and 35, new claims 33, 34, 36 and 37 are also independently patentable given that the cited references, alone or in combination, do not teach or suggest all of the features of these claims. Support for new dependent claims 33, 34, 36 and 37 may be found at least on page 10, lines 12-23 of the originally-filed specification.

III. Conclusion

In view of the foregoing remarks, Applicant respectfully submits that all of the claims of the present application are in condition for allowance. It is respectfully requested that a Notice of Allowance be issued in due course. Examiner Pham is encouraged to contact Applicant's undersigned attorney to resolve any remaining issues in order to expedite examination of the present application.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

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Respectfully submitted,



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